

From: <u>Carlos Sanchez</u>
To: <u>Robert Werner</u>

Cc: Rafael Casanova; moore.gary@epa.gov; Gloria-Small Moran; Lydia Johnson

Subject: Re: Falcon Refinery (06MC) - RI/FS Takeover Letter (Draft) - Casanova Comments

Date: 10/20/2011 02:15 PM

Attachments: Letter - NORCO c-o Bergner - RI-FS Takeover Letter 2011-10-19 (draft) carlos comments.docx

Bob,

Sorry I did not provide comments before. Here are my comments (strike outs and green highlight)



Letter - NORCO c-o Bergner - RI-FS Takeover Letter 2011-10-19 (draft) carlos comments.docx

Carlos A. Sanchez Chief, AR/TX Section Region 6, Superfund Division (6SF-RA) sanchez.carlos@epa.gov (214) 665-8507

Rafael Casanova---10/20/2011 01:35:08 AM---Bob, attached are my comments on the subject draft letter. Call me at (b) (6) with any quest

From: Rafael Casanova/R6/USEPA/US
To: Robert Werner/R6/USEPA/US@EPA

Cc: Carlos Sanchez/R6/USEPA/US@EPA, moore.gary@epa.gov, Gloria-Small Moran/R6/USEPA/US@EPA, Lydia Johnson/R6/USEPA/US@EPA

Date: 10/20/2011 01:35 AM

Subject: Re: Falcon Refinery (06MC) - RI/FS Takeover Letter (Draft) -

Casanova Comments

Bob, attached are my comments on the subject draft letter. Call me at (b) (6) with any questions or comments.

[attachment "Letter - NORCO c-o Bergner - RI-FS Takeover Letter 2011-10-19 (draft) casanova comments.docx" deleted by Carlos Sanchez/R6/USEPA/US]

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Rafael Casanova, P.G. (Remedial Project Manager, Environmental Scientist) U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

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Assigned Sites for Investigation and Remediation:

(http://www.epa.gov/earth1r6/6sf/6sf-tx.htm):
Brine Service Company Superfund Site (Corpus Christi, Texas)
Donna Reservoir and Canal Superfund Site (Donna, Texas)
Falcon Refinery Superfund Site (Ingleside, Texas)
Many Diversified Interests, Inc. Superfund Site (Houston, Texas)
Palmer Barge Line Superfund Site (Port Arthur, Texas)
State Marine of Port Arthur Superfund Site (Port Arthur, Texas)

▼ Robert Werner---10/19/2011 12:52:55 PM---Rafael, Letter looks OK to me. Please review/change as needed the below comments that I've copied f

From: Robert Werner/R6/USEPA/US
To: Rafael Casanova/R6/USEPA/US@EPA
Cc: Gloria-Small Moran/R6/USEPA/US@EPA, Gary

Moore/R6/USEPA/US@EPA Date: 10/19/2011 12:52 PM

Subject: Falcon Refinery (06MC) - RI/FS Takeover Letter (Draft)

Rafael,

Letter looks OK to me.

Please review/change as needed the below comments that I've copied from the letter.

3. Paragraph H, subparagraphs 5 and 6:

The Agreed Order specifies that NORCO must submit all RI/FS final deliverables to the EPA by September 28, 2012. NORCO has failed to submit a schedule to the EPA that reflects September 28, 2012, as the RI/FS completion date.

4. Paragraph H, subparagraph 4:

NORCO has failed to submit a current Phase II Work Plan, per the Agreed Order, for the RI/FS to the EPA. The latest Work Plan submitted by NORCO to the EPA was dated August 24, 2007. Although NORCO has since amended .??????

NORCO has failed to submit to the EPA, per the Agreed Order, updated human health and ecological risk screening levels. Data in the human health risk table that NORCO has submitted to the EPA is not entirely correct.

[attachment "Letter - NORCO c-o Bergner - RI-FS Takeover Letter 2011-10-19 (draft).docx" deleted by Rafael Casanova/R6/USEPA/US]